

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection

*Wheeling - Pittsburgh Steel Corp.
Beech Bottom WV
WVD 00 079 7720*

DATE: *12/24/87*

FROM:

DAD
Douglas A. Donor, Environmental Scientist
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

TO:

John A. Armstead, Chief *C.B.T. for J.A.A.*
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE
VIOLATIONS.

*Gen. Training, Contingency Plan, Open Containers violation.
State Notice of Non Compliance attached*



STATE OF WEST VIRGINIA
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
1260 Greenbrier Street
Charleston, West Virginia 25311

ARCH A. MOORE, JR.
Governor

RONALD R. POTESTA
Director

ROBERT K. PARSONS
Deputy Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 4, 1987

Ms. Nancy Ray
Wheeling-Pittsburgh Steel Corporation
Route 2
Beech Bottom, West Virginia 26030

RCRA COMPLIANCE SECTION
RECEIVED

DEC 23 1987

Dear Ms. Ray:

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Division of Waste Management. This report is based on the inspection conducted on October 21, 1987.

In this report, please refer to the "Compliance Evaluation" section for those violations detected during the course of this inspection and "Notice of Non-Compliance" for the actions taken by the Enforcement Unit of this Division.

An additional copy of this report and "Notice of Non-Compliance" will be transmitted to the United States Environmental Protection Agency (U. S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at 304/348-5929.

Sincerely,

DIVISION OF WASTE MANAGEMENT

Ava C. Zeitz
Compliance Monitoring and
Enforcement Section Leader

ACZ/pd
Enclosure

cc: Doug Donor, EPA, Region III
John Meeks, Enforcement Unit
David Swisher, Inspector

NOTICE OF NON-COMPLIANCE

Wheeling-Pittsburgh Steel Corporation
WVD000797720

On October 21, 1987, authorized representatives of the Chief of the Division of Waste Management conducted a Compliance Evaluation Inspection at your Beech Bottom, West Virginia facility. During the inspection the following items of non-compliance were noted:

1. The generator does not keep containers closed, except when necessary to add or remove waste. This is a violation of 40 C.F.R. § 265.173(a) as referenced by Sections 6.3.5.a.1 and 6.3.5.c.1 of the West Virginia Hazardous Waste Management Regulations (hereinafter the "Regulations").
2. The generator has not submitted copies of the contingency plan to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services. This is a violation of 40 C.F.R. § 265.53 as referenced by Section 6.3.5.a.5 of the Regulations.
3. The generator has not conducted personnel training for all employees involved in hazardous waste management. This is a violation of 40 C.F.R. § 265.16(a),(b),(c),(d) and (e) as referenced by Section 6.3.5.a.5 of the Regulations.

This will serve as a **Notice of Non-Compliance** of the provisions of Chapter 20, Article 5E of the Code of West Virginia. In order to achieve compliance in the areas where the violations were observed, Wheeling-Pittsburgh Steel Corporation must perform the following remedial actions:

1. Upon receipt of this letter, ensure that all containers used to accumulate hazardous waste are kept closed, except when it is necessary to add or remove waste.
2. Upon receipt of this letter, submit copies of the contingency plan to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services.
3. Within 30 days of receipt of this letter, ensure that all employees involved in hazardous waste management are properly trained and that proper documentation is established, in accordance with 40 C.F.R. § 265.16.

Wheeling-Pittsburgh Steel Corporation

NON

Page 2

4. Within 45 days of receipt of this letter, reply in writing to this office documenting that the requirements of this notice have been complied with.

Additionally, note that failure to keep containers closed is a repeat violation documented in the inspection of September 25, 1986. This office received notice from Wheeling-Pittsburgh Steel Corporation on March 9, 1987 that all previously noted areas of non-compliance had been corrected. To avoid elevated enforcement action in the future, Wheeling-Pittsburgh Steel Corporation must actually ensure that areas of non-compliance have been corrected and remain corrected.

If you have any questions concerning this matter, please contact Mr. John Meeks of the Enforcement Unit at 304/348-5929.

INSPECTION FACT SHEET

COMPANY NAME: Wheeling-Pittsburgh
Steel Corporation

I. D. #: WVD000797720

MAILING ADDRESS: Route 2
Beech Bottom, West Virginia
26030

TYPE OF FACILITY: Generator

LOCATION:

COUNTY: Ohio

COMPANY CONTACT: Nancy Ray
Environmental Coordinator

HANDLING CODES: S01
S02

PHONE: (304) 234-2672

PURPOSE: Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E;
West Virginia Administrative Regulations for Chapter 20-5E;
and/or 40 CFR Part 265.

LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled; where it goes)

D001
D002
D007

DATE INSPECTED: October 21, 1987

INSPECTORS: (1) David B. Swisher, West Virginia Department of Natural Resources,
Division of Waste Management
(2) James R. Fenske, West Virginia Department of Natural Resources,
Division of Waste Management
(3)

DATE PREPARED: October 26, 1987

PREPARED BY: David B. Swisher

TABLE OF CONTENTS

Inspection Report

Attachments:	A - Location Map
	B - Site Map
	C - Facility Entry Form
	D - Checklist: Generators
	E - Checklist: Containers
	F - WWTP Sludge Analysis
	G - Manifest: WWTP Sludge (D007)
	H - Manifest: Waste Paint/Solvent
	I - Manifest: Waste Petroleum Naptha (Safety Kleen)

INSPECTION REPORT

COMPANY: Wheeling Pittsburgh Steel Corporation - Beech Bottom Plant

DATE INSPECTED: October 21, 1987

INSPECTORS: David B. Swisher, West Virginia Department of Natural Resources,
Division of Waste Management

James R. Fenske, West Virginia Department of Natural Resources,
Division of Waste Management

DATE PREPARED: October 26, 1987

PREPARED BY: David B. Swisher, Division of Waste Management

On October 21, 1987 the above referenced inspectors conducted a Compliance Evaluation Inspection of Wheeling Pitt. Upon our arrival at 1000 hours we were met by Nancy Ray, Environmental Coordinator and Jim Allen, Superintendant of Maintenance, who had been previously advised of our intentions to inspect their facility via a phone conversation.

Upon presentation of appropriate credentials, we advised the officials of our authority as representatives of the Chief of the Division of Waste Management pursuant to Chapter 20 of the Code of West Virginia and as specified in Section 3007(a) of the Resource Conservation and Recovery Act and they acknowledged our authority. The facility representatives were informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regulations promulgated thereunder.

There have been no changes in hazardous waste operations at this facility since the last CEI (September 25, 1986). Wastes are generated as a result of cleaning and surface preparation of the metal prior to manufacturing metal products such as roof decks, steel mesh, and corrugated culverts.

The inspection began with a review of the facility's hazardous waste management files. The following items were reviewed:

- 1). Contingency Plan - A copy of the contingency plan has not been submitted to the local emergency response agencies.
- 2). Personnel Training - There was no hazardous waste training documented below supervisor level.
- 3). Manifests - The WWTP sludge (D007) is shipped to Chem-Met, Wyandotte, MI for disposal (Attachment "G"). On October 26, 1987 I spoke with Bill Hartman of Chem-Met. He said that the sludge is solidified with limestone fines and then placed into a hazardous waste landfill.

The waste paint/solvent mixture is shipped to Ecolotech, Inc., Dayton, Ohio for incineration (Attachment "H"). There was no waste analysis for the paint waste on-site.

(con't)

The facility has nine (9) Safety Kleen drums throughout the plant. The spent petroleum naptha is picked up and recycled by Safety Kleen Corporation (Attachment "I").

- 4). There were no annual reports or exception reports provided for inspection.

Following the file review, we conducted a physical inspection of the plant.

There is a satellite accumulation drum located in the paint mixing room (Attachment "B"). This drum receives paint solids, filters, and rags from their paint recycling operation. At the time of this inspection, the drum was not closed, nor was it labelled with the words "hazardous waste".

Two other areas of concern were the hazardous materials storage building and the wastewater treatment plant. The following observations were made in these areas:

- 1). Hazardous Materials Storage Building - At the time of this inspection, we noted 34 drums of unused paint, 66 drums of used paint to be recycled, and 40 drums of paint waste awaiting shipment. There were also numerous drums of an oil/water mixture located in the back of the building. Mr. Allen indicated that the oil/water mixture is recycled to recover the oil. All of the paint waste drums were properly labelled and dated.
- 2). Wastewater Treatment Plant - The WWTP sludge (D007) is collected in large hoppers after being dewatered. These hoppers are emptied into a large rolloff container located outside the treatment plant (Attachment "B"). Neither the hoppers nor the rolloff container are kept closed when not in use. The rolloff container is used to store the waste until it is shipped to Chem-Met (about 11 cubic yards once/week).

We also inspected the corrugating facility where the culverts are produced. The only hazardous waste generated in this operation is waste petroleum naptha (D001) from a Safety Kleen drum. This drum is serviced monthly by Safety Kleen Corporation.

Following the inspection, we thanked the facility representatives for their cooperation and assistance and departed.

COMPLIANCE EVALUATION

The following violations were found during this inspection:

1. This facility did not submit a copy of the contingency plan to the local police, fire departments, hospitals and emergency response teams, and therefore is in violation of 40 CFR 265.53 as referenced by Section 6.3.5.a.5 of the West Virginia Hazardous Waste Management Regulations (hereinafter "the Regulations").
2. This facility did not conduct personnel training for all employees involved in hazardous waste management and therefore, is in violation of 40 CFR 265.16 as referenced by Section 6.3.5.a.5 of the Regulations.
3. This facility's satellite accumulation containers are not kept closed during storage. Therefore, the facility is in violation of 40 CFR 265.173(a) as referenced by Section 6.3.5.c.1.i of the Regulations.

CONCERNS

The following concerns were raised during the inspection:

1. Storage of waste paint prior to recycling. As previously mentioned, there were 66 drums that had not yet been recycled. Mr. Allen indicated that they recycle about 20 drums per week. However, they do not keep any records of the amount of this material that is recycled. This material could possibly be subject to the definition of speculative accumulation as defined by the West Virginia Hazardous Waste Management Regulations.
2. Based on their most recent analysis (Attachment "F"), Wheeling Pitt has some questions as to whether or not the sludge should be considered a hazardous waste (note the EP Tox value for chromium).
3. Shipment of the paint/solvent waste as D001 (Attachment "H"). No analysis has been conducted to determine the constituents of the waste (ie. F-solvents, metals, etc.).

BEECH BOTTOM PLANT
WHEELING PITTSBURGH
WVD000797720

TILTONSVILLE, OHIO - W. VA.

1968
PHOTO REVISÉ 1978
AMS 4864 II NW - SERIES 9854

BEECH BOTTOM PLANT
WHEELING PITTSBURGH
WVD000797720

TILTONSVILLE, OHIO - W. VA.

1968
PHOTO REVISÉ 1978
AMS 4864 II NW - SERIES 9854

BEECH BOTTOM PLANT
WHEELING PITTSBURGH
WVD000797720

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PHOTO REVISÉ 1978
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BEECH BOTTOM PLANT
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WVD000797720

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WVD000797720

TILTONSVILLE, OHIO - W. VA.

1968
PHOTO REVISÉ 1978
AMS 4864 II NW - SERIES 9854

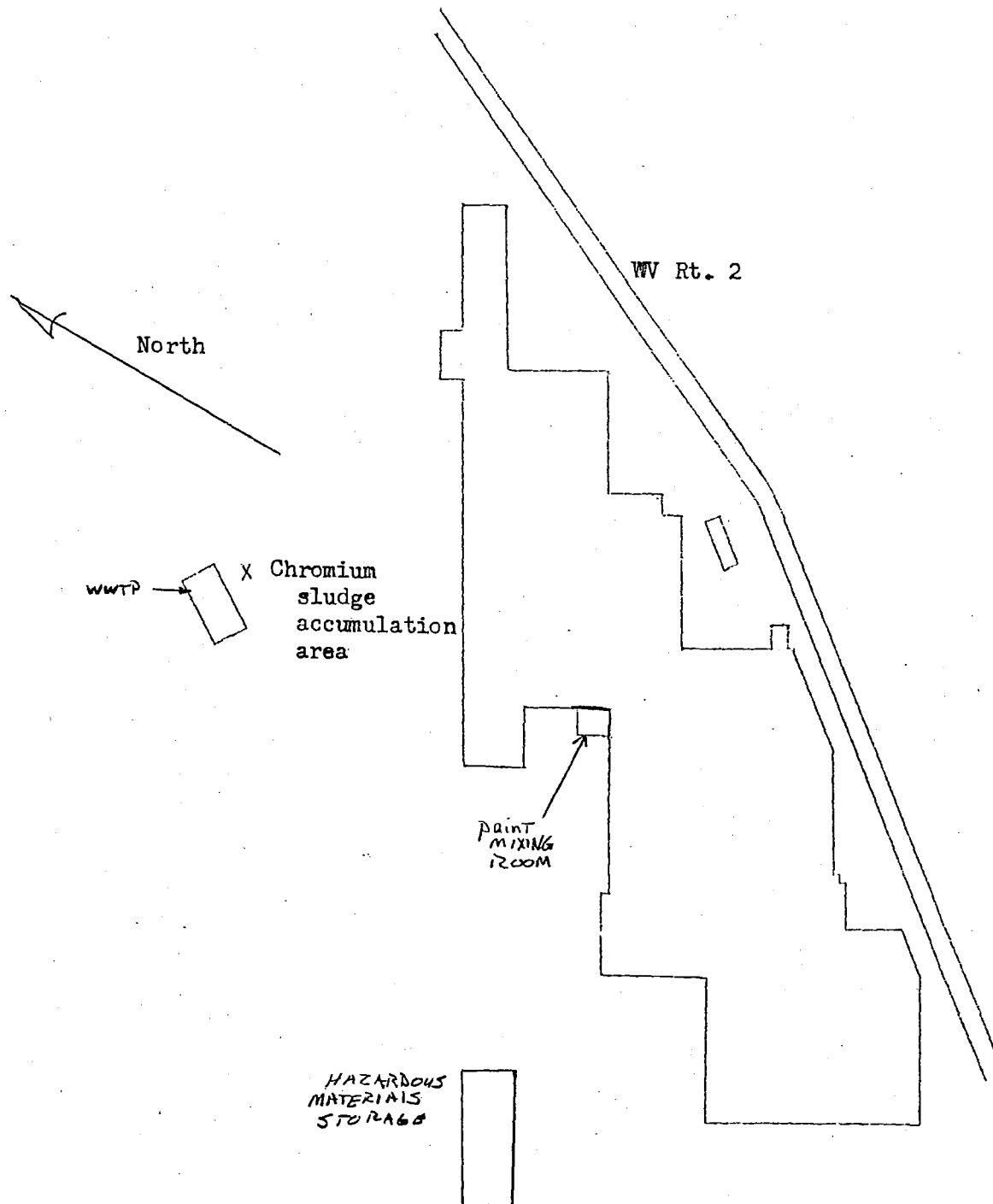
ATTACHMENT "B"

SITE MAP

BEECH BOTTOM PLANT

WHEELING PITTSBURGH

WVD000797720



FACILITY ENTRY FORM

On OCTOBER 21 at 1010, this inspector
Date Time

presented his/her Identification Card and explained Inspection
Authorities to NANCY RAY, of
Facility Representative

WHEELING PITTSBURGH STEEL - BECK BOTTOM
Facility

David B. Lunshee
Inspector's Signature

Authority for this inspection appears in Chapter 20, Article 5E, Section 12 of the Code of West Virginia; in the West Virginia Administrative Regulations for Chapter 20, Article 5 of the Code of West Virginia, and the Resource Conservation and Recovery Act (RCRA), Section 3007(a).

This inspector is a duly authorized representative of the Chief of the Division of Waste Management, West Virginia Department of Natural Resources and as such has the powers provided by Article 5E, Chapter 20 of the West Virginia Code.

I consent to this inspection at 1010, on OCT. 21.
Time Date

Nancy Ray
Representative's Signature

West Virginia Hazardous Waste Management Regulations, Section 6
 "Standards Applicable to Generators of Hazardous Waste"

NAME OF FACILITY: Wheeling PITTSBURGH STEEL - BEECH BOTTOM PLANT

ADDRESS: STATE ROUTE 2 BEECH BOTTOM, WV - 26030

LOCATION: _____

EPA GENERATOR I. D. #: WV D060 797720

FACILITY INSPECTION REPRESENTATIVE: NANCY RAY

TITLE: ENVIRONMENTAL COORDINATOR

TELEPHONE NUMBER: (304) 234-2781

NOTE: A generator who treats, stores, or disposes of hazardous waste on-site
 must answer Questions 1 through 4, 9 through 11, and 14(c), only.

Fert. Regs.
20-5E HWMR

1. Are 1000 kg (2200 lbs.) or more hazardous waste produced by the generator facility in one month? (if the amount is less than 1000 kg per month, then the facility qualifies as a small quantity generator and the Small Quantity Generator Checklist should be completed.)

YES NO

2. What categories of hazardous wastes result from the generator's facility?

A. Ignitable wastes (D001)

YES NO

B. Corrosive wastes (D002)

YES NO

C. Reactive wastes (D003)

YES NO

D. EP Toxic wastes

Types: D007 ~~D008~~ D008

HWMR Listed wastes: _____

6.02.01 If on-site, then the check list for
TSD facility must also be completed.

4. Is the generator presently . . .
 - A. Treating hazardous waste? YES ☒
 - B. Storing hazardous wastes longer than 90 days? YES ☒
 - C. Disposing of hazardous waste? YES ☒
- 6.02.01(a) 5. Does the generator use the Uniform Hazardous Waste Manifest OMB control number 200-0404 on EPA Form 8700-22, and if necessary, EPA Form 8700-22A? YES ☒ NO ☐
- 6.02.01(b) 6. Does the generator designate on each manifest one facility which is permitted to handle the waste described on the manifest? YES ☒ NO ☐
- 6.02.01(c) 7. Does the generator designate on each manifest one alternate facility which is permitted to handle his waste in the event an emergency prevents delivery of the waste to the primary designated facility? YES ☒ NO ☐
- 6.02.02 8. Does the manifest consist of at least the number of copies which will provide the generator, each transporter, and the owner or operator of the designated facility with one copy for their records and another copy to be returned to the generator? YES ☒ NO ☐
- 6.03.05(a) 9. Is all hazardous waste, within 90 days, either shipped off-site to a designated facility or placed in a permitted or interim status on-site facility? YES ☒ NO ☐
- 6.03.05(a)(2) 10. Is the date upon which each period of accumulation begins clearly marked and visible on each container? YES ☒ NO ☐
- 6.03.05(a)(4) 11. While being accumulated, on-site, is each container and tank labeled or marked clearly with the words "Hazardous Waste"? YES ☐ NO ☒
12. Before transporting hazardous waste or offering hazardous waste for transportation off-site, does the generator . . .
 - 6.03.01 A. Package? YES ☒ NO ☐
 - 6.03.02 B. Label? YES ☒ NO ☐
 - 6.03.03 C. Mark? YES ☒ NO ☐
- each package of hazardous waste in accordance with Department of Transportation regulations? YES ☒ NO ☐

Does the generator keep a copy of each of the following for three years:

YES

14. Does the generator keep a copy of each of the following for three years:

6.04.01(a)

A. Manifests?

YES

6.04.01(b)

B. Annual Reports and Exception Reports?

YES

6.04.01(c)

C. Waste analyses, test results, and other determinations for wastes sent to on-site treatment, storage, or disposal?

* YES

* WASTE ANALYSIS FOR WWTB SLUDGE ONLY - NONE FOR PAINT WASTE

Questions 15 - 22 apply to generators who accumulate wastes in a non-permitted facility.

40 C.F.R.

265.16(a)

- *15. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?

YES

NO

265.16(b)(1)

- *16. Does the generator facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job?

YES

NO

265.16(d)(2)

- *17. Does the generator facility have on record a written position description for each job title noted in Question 16?

YES

NO

265.16(d)(3)

- *18. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees listed in Question 16?

YES

NO

19. Has the generator facility installed the following equipment:

265.32(a)

A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage is threatened by fire or explosion?

YES

NO

265.32(b)

B. A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from police, fire department, etc.

YES

NO

* ONLY SUPERVISOR'S TNG. DOCUMENTED

3

265.52

20. Does the generator facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies?

YES

NO

21. Does the facility have a contingency plan which contains the following:

265.52(a)

A. Detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, or water?

YES

NO

265.52(c)

B. A detailed description of arrangements formally agreed to by local police, fire departments, and state and local emergency response organizations?

YES

265.52(d)

C. A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators?

YES

NOTE: This listing should include names and phone numbers of emergency coordinators on a 24-hour basis.

265.52(e)

D. A listing of appropriate emergency equipment necessary to cope with emergencies at the generator facility.

YES

265.53

22. Has a copy of the Contingency Plan been submitted to local police, fire departments, hospitals, and emergency response teams that may be called to provide emergency services?

YES

NO

First Inspector

Second Inspector

INSPECTOR'S NAME: <u>DAVID B. SWISHER</u>	<u>JAMES R. FEUSKE</u>
TITLE: <u>INSPECTOR, DWM</u>	<u>INSPECTOR, DWM</u>
AGENCY: <u>WVDNR</u>	<u>WVDNR</u>
OFFICE LOCATION: <u>WHEELING</u>	<u>WHEELING</u>
INSPECTION DATE: <u>OCT 21 1987</u>	<u>OCT 21 1987</u>

RESOURCE CONSERVATION AND RECOVERY ACT

CHECKLIST FOR USE AND MANAGEMENT OF CONTAINERS

Subpart I, §265.170 "General Operating Requirements"
as referenced by Section 8.1.6 for TSD facilities and 6.3.5.a.1 for generators of the
West Virginia Administrative Regulations promulgated under Chapter 20, Article 5E
of the West Virginia Code.

NAME OF FACILITY: WHEELING PITTSBURGH STEEL - BEECH BOTTOM PLANT

ADDRESS: STATE ROUTE 2 BEECH BOTTOM, WV. 26030

LOCATION: _____

EPA GENERATOR I. D. #: WV D000 797720

FACILITY INSPECTION REPRESENTATIVE: NANCY RAY

TITLE: ENVIRONMENTAL COORDINATOR

TELEPHONE NUMBER: (304) ~~242~~ 234-2781

NOTE: The questions contained in this checklist apply to owners and operators of
all hazardous waste facilities that store containers of hazardous waste,
except as Section 265.1 provides otherwise.

Pert. Regs.
40 C.F.R. §265.

- | | | | |
|------------------------|---|------------|-----------|
| 265.171 | 1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? | <u>YES</u> | NO |
| 265.172 | 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes? | <u>YES</u> | NO |
| 265.173(a) | 3. Are all containers holding hazardous waste kept closed during storage? | YES | <u>NO</u> |
| 265.174 | 4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week? | <u>YES</u> | NO |
| 265.15(d)
265.15(b) | 5. Is an inspection log maintained? | YES | <u>NO</u> |

- 265.176 6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line? ☒ YES ☐ NO
- 265.177(a) 7. Are incompatible wastes placed in the same container? (see Appendix 5 for examples) YES ☒ NO
- 265.177(c) 8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? N/A
YES ☐ NO ☐

First Inspector

Second Inspector

INSPECTOR'S NAME: DAVID B. SWISHER

JAMES R. FEUSKE

TITLE: INSPECTOR, DWM

INSPECTOR, DWM

AGENCY: WV DNR

WV DNR

OFFICE LOCATION: WHEELING

WHEELING

INSPECTION DATE: OCT 21, 1987

OCT 21, 1987

ANALYSIS REPORT

ATTACHMENT F

LANCY LABORATORIES

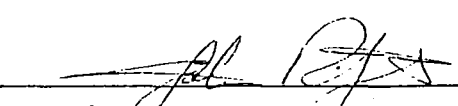
Division, Lancy International, Inc.

Company Wheeling Pittsburgh - PADER Module 1 Report Date 4/28/87 (Rev. 5/11/87)
 Description Beech Bottom Sludge PO#/Chg.# 544009

Sample Lab Reference #	Waste 25819 (mg/Kg)	EPTOX Leachate 25820 (mg/L)	ASTM Leachate 25821 (mg/L)
Parameter			
pH (SU)	8.5	5.1*	8.6
Solids, Total	37%	-	-
Solids, Total Dissolved	-	-	172
Solids, Volatile (of TS)	13%	-	16%
Oil & Grease	1500	<4.0	-
Ammonia-N	-	<0.1	-
Cyanide, Total	<0.5	-	<0.01
Organic Carbon, Total	-	-	8.3
Organic Halide, Total	-	-	0.051
Oxygen Demand, Chemical	-	-	25
Phenol	-	<0.005	-
Heat Value (BTU/LB)	<500	-	-
Antimony	-	<0.2	-
Arsenic	<7	<0.018	-
Barium	300	<0.2	-
Cadmium	1.0	<0.01	-
Chromium, Hexavalent	-	-	<0.01
Chromium, Total	7700	<0.05	-
Copper	55	0.05	-
Lead	120	<0.10	-
Mercury	<0.11	<0.004	-
Molybdenum	10	<0.2	-
Nickel	13 (g/Kg)	116	-
Selenium	<5	<0.012	-
Silver	7.0	<0.01	-
Zinc	30 (g/Kg)	69	-
Calcium	237 (g/Kg)	-	-
Chloride	533	-	-
Iron	43 (g/Kg)	-	-
Ignitability	Non-Ignitable		
Corrosivity (pH)	Non-Corrosive		
Reactivity:	Reactive (Per 40 CFR 261.23 (a) (5))		
Cyanide, Total	<0.5		
Sulfide, Reactive	904		
EP Toxicity	Non-EPToxic		

*Initial pH: 9.1
Grams of Sample Leached: 100
Milliliters of acetic acid used: 380

Metal Analyses on Waste Sample
 reported on a Dry Weight Basis.


 C. John Ritzert, Manager-Technical Operations

Page 1 of 1



MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT ☐ DIS ☐ REJ ☐ PR ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type

Form Approved, OMB No. 2050-0038 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. WV D 000 797 720	Manifest Document No. 012	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address WHEELING-PITTSBURGH STEEL CORP ROUTE 2, DEECH BOTTOM, WV 26030			A. State Manifest Document Number MI 1174531		
4. Generator's Phone (304) 234-2781 OR (304) 234-7628			B. State Generator's ID WV D 000 797 720		
5. Transporter 1 Company Name 7-7			C. State Transporter's ID 000-221-6077		
6. US EPA ID Number OH D 009 772 558			D. Transporter's Phone		
7. Transporter 2 Company Name			E. State Transporter's ID		
8. US EPA ID Number			F. Transporter's Phone		
9. Designated Facility Name and Site Address CHEM-MET 18550 ALLEN RD WYANDOTTE, MI 48192			G. State Facility's ID		
10. US EPA ID Number MI D 096 963 194			H. Facility's Phone 313-282-9250		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) HAZARDOUS WASTE, SOLID, H.O.S. (WASTEWATER TREATMENT SLUDGE) ORM-E, HA9189 (EPA HP TOXICITY, CHROMIUM)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a.	1	CM	000111	1	5.007 H
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above E-SL			K. Handling Codes for Wastes Listed Above a) 1 b) 1 c) 1 d) 1		
15. Special Handling Instructions and Additional Information NOTE: DESIGNATED FACILITY RETURN BLUE COPY TO WHEELING-PITTSBURGH STEEL, ENV. CONTROL DEPT DUVALL CENTER, WHEELING, WV 26003					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name J. M. Mann			Date 11/12/83		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature			Date 11/12/83		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature			Date 11/12/83		
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Date					

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-252-4706 OR OUT OF STATE AT 517-373-7680 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-6802 24 HOURS PER DAY.

UNIFORM HAZARDOUS WASTE MANIFEST		21 Generator's US EPA ID No WVD 000797072		Manifest Document No C0003		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
		3. Generator's Name and Mailing Address WHEELING-PITTSBURGH STEEL CORP. BEECH BOTTOM, WV 26030						A. State Manifest Document Number					
4. Generator's Phone (304) 234-2936 OR (412) 288-3600						B. State Generator's ID							
5. Transporter 1 Company Name MONTE D. LEWIS TRUCKING				6. US EPA ID Number OHD 980 822 092		C. State Transporter's ID		D. Transporter's Phone 614/937-2641					
7. Transporter 2 Company Name				8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone					
9. Designated Facility Name and Site Address ECOLOTEC, INC. 636 NORTH IRWIN ST. DAYTON, OH 45403				10. US EPA ID Number OHD 980 700 942		G. State Facility's ID		H. Facility's Phone 513/254-9990					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
						No. Type							
						a. <input checked="" type="checkbox"/> FLAMMABLE SOLIDS, N.O.S. WASTE PAINT SOLVENT, RAGS, SOLID, UN1325		80 DR		24000		P D 0 0 1	
						b.							
						c.							
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information NOTE: DESIGNATED FACILITY: RETURN ORIGINAL TO: WHEELING-PITTSBURGH STEEL CORP. ENVIRONMENTAL CONTROL DEPT. DUVALL CENTER, WHEELING, WV 26003													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
Printed/Typed Name DOMINIC MORENO JR.					Signature Dominic Moreno Jr.			Month Day Year 05/06/86					
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name MONTE D LEWIS					Signature Monte D Lewis			Month Day Year 05/06/86					
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name					Signature			Month Day Year					
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name MARK M Lynch					Signature Mark M Lynch			Month Day Year 05/12/86					

UNIFORM HAZARDOUS WASTE MANIFEST		2. Generator's US EPA ID No WVD 000 797 720	Manifest Document No 00017	2. Page 1 of 1	Information in the shaded areas is not required by Federal law
3. Generator's Name and Mailing Address WHEELING-PITTSBURGH STEEL CORP ROUTE 2, BEECH BOTTOM, WV 26030				A. State Manifest Document Number	
4. Generator's Phone (304) 234-2936 OR (412) 288-3600				B. State Generator's ID	
5. Transporter 1 Company Name SAFETY-KLEEN CORP		6. US EPA ID Number WVD 981 034 101		C. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 304-233-6567	
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP 10 INDUSTRIAL PARK DRIVE WHEELING, WV 26003				E. State Transporter's ID	
10. US EPA ID Number WVD 981 034 101				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 304-233-6567	

	12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	1. Waste No
a. US DOT Description (including Proper Shipping Name, Hazard Class and ID Number)				
HAZARDOUS PETROLEUM NAPHTHA COMBUSTIBLE LIQUID, UN1255	9	DM	160	P D 0 0 1
b.				
c.				
d.				

J. Additional Descriptions for Materials Listed Above	K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information **NOTE: DESIGNATED FACILITY:**
RETURN ORIGINAL TO: WHEELING-PITTSBURGH STEEL CORP.
ENVIRONMENTAL CONTROL DEPT
DUVALL CENTER, WHEELING, WV 26003

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name HENRY DETHO	Signature Henry Detho	Month Day Year 11 13 1977
17. Transporter 1 Acknowledgement of Receipt of Materials		
Printed/Typed Name Bob Stenger	Signature Bob Stenger	Month Day Year 11 17 77
18. Transporter 2 Acknowledgement of Receipt of Materials		
Printed/Typed Name	Signature	Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		
Printed/Typed Name M. Wimmer	Signature M. Wimmer	Month Day Year 11 20 77